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9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**
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13 IN RE CATHODE RAY TUBE (CRT)) Master File No. 3:07-cv-5944 SC
14 ANTITRUST LITIGATION)
15 _____) MDL No. 1917
16 This Document Relates to:)
17 Indirect-Purchaser Class Action)
18 *Sharp Electronics Corp., et a. v. Hitachi Ltd., et al.*, No. 13-cv-1173;) **DECLARATION OF GERARD A. DEVER IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' RESPONSE TO DEFENDANTS' JOINT MOTION IN LIMINE NO. 6:**
19 *Sharp Elecs. Corp. v. Koninklijke Philips Elecs.* N.V., No. 13-cv-02776;) **TO EXCLUDE IMPROPER CHARACTERIZATIONS OF OR REFERENCES TO DEFENDANTS AND ALLEGED CO-CONSPIRATORS**
20 *Siegel v. Hitachi, Ltd.*, No. 11-cv-05502;)
21 *Siegel v. Technicolor SA, et al.*, No. 13-cv-05261;)
22 *Best Buy Co., et al. v. Hitachi, Ltd., et al.*, No. 11-cv-05513;)
23 *Best Buy Co., et al. v. Technicolor SA, et al.*, No. 13-cv-05264;)
24 *Target Corp. v. Chunghwa Picture Tubes, Ltd.*, et al., No. 11-cv-05514;)
25 *Target Corp. v. Technicolor SA, et al.*, No. 13-cv-05686;)
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Sears, Roebuck and Co. and Kmart Corp. v. Chunghwa Picture Tubes, Ltd., No. 11-cv-05514;
Sears, Roebuck and Co. and Kmart Corp. v. Technicolor SA, No. 13-cv-05262;
Viewsonic Corp. v. Chunghwa Picture Tubes, Ltd. No. 14-cv-02510.

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1 I, Gerard A. Dever, hereby declare and state as follows:

2 1. I am a member of the law firm Fine, Kaplan and Black, R.P.C., counsel for the
3 Indirect Purchaser Plaintiffs in the above-captioned action currently pending in the U.S. District
4 Court for the Northern District of California. I am a member in good standing of the bar of the
5 Commonwealth of Pennsylvania and I am admitted *pro hac vice* to practice before this Court. I
6 submit this Declaration in support of Indirect Purchaser Plaintiffs' Response to Defendants' Joint
7 Motion *In Limine* No. 6 to Exclude Improper Characterizations Of or References to Defendants
8 and Alleged Co-Conspirators.

9 2. Attached hereto as **Exhibit A** is a true and correct copy of a Hitachi email (HDP-
10 CRT00048694E-695).

11 1. Attached hereto as **Exhibit B** is a true and correct copy of a Contact Report
12 (CHU00028755.01-756.02).

13 2. Attached hereto as **Exhibit C** is a true and correct copy of an letter from Philips to
14 Samsung (SDCRT-0086690).

15 3. I declare under penalty of perjury under the laws of the United States that the
16 foregoing is true and correct.

17 Executed on February 27, 2015, in Philadelphia, Pennsylvania.

19 /s/ Gerard A. Dever

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